UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

DEREK SINCERE BLACK WOLF CRYER,

Plaintiff,

v.

Civil Action No. 05-11289-RCL

KATHLEEN M. DENNEHY, et al.,

Defendants.

MOTION OF DEFENDANTS TO ENLARGE TIME

Defendants, Kathleen M. Dennehy, Michael Thompson, Carol Mici, Greg McCann, Tina

Ranno, Mary Robinson, William Taylor, Thomas Lavelle and William Taylor, through counsel, hereby

move this Court to enlarge the time for filing a responsive pleading to plaintiff's Complaint and

Amended Complaint, up to and including January 31, 2006.

In support of this motion, counsel states that this case was only recently assigned to the

Department of Correction's Legal Division, and additional time is necessary in order to investigate

and make an informed response to the allegations contained in plaintiff's Complaint and Amended

Complaint.

Dated: December 21, 2005

Respectfully submitted,

NANCY ANKERS WHITE

Special Assistant Attorney General

/s/ Richard C. McFarland

Richard C. McFarland, BBO# 542278

Legal Division

Department of Correction

70 Franklin Street, Suite 600

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(617) 727-3300, Ext. 132

CERTIFICATE OF SERVICE

I, Richard C. McFarland, counsel for Defendants, hereby certify that I served a copy of the foregoing motion upon *pro se* plaintiff, Derek Sincere Black Wolf Cryer, by first class mail, postage prepaid, to his address: MCI-Shirley, P.O. Box 1218, Shirley, MA 01464.

Dated: December 21, 2005 /s/ Richard C. McFarland

Richard C. McFarland